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Attorneys for Federal Defendants

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

MARC COHODES,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF  
JUSTICE, FEDERAL BUREAU OF  
INVESTIGATION, EXECUTIVE

OFFICE FOR UNITED STATES  
ATTORNEYS, and CRIMINAL DIVISION OF

UNITED STATES DEPARTMENT OF  
JUSTICE

Defendants.

) CASE NO. 20-cv-04015-SBA

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) **STIPULATION AND ~~PROPOSED~~ ORDER**

) **CONTINUING CASE MANAGEMENT**

) **CONFERENCE**

) **Date:** May 5, 2021

) **Time:** 2:45 p.m.

) **Courtroom:** via telephone conference

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1 Defendants United States Department of Justice, Federal Bureau of Investigation (“FBI”), and  
2 Executive Office for United States Attorneys (“EOUSA”), and the United States Department of Justice’s  
3 Criminal Division (“Criminal Division”) (collectively, “Federal Defendants”), and Plaintiff Marc  
4 Cohodes, by and through their counsel, hereby stipulate to continue the May 5, 2021 Case Management  
5 Conference to June 3, 10 or 17, 2021, subject to the Court’s approval and for the reasons set forth below.

6 The FBI made its final release of pages on April 23, 2021, which Defendants’ counsel e-mailed  
7 to Plaintiff’s counsel on April 27, 2021.

8 In addition, the FBI, EOUSA, and the Criminal Division prepared search descriptions that were  
9 provided to Plaintiff’s counsel as a confidential settlement communication.

10 Plaintiff has provided some comments on certain redactions from earlier releases that it has  
11 requested the FBI to consider. Counsel for Federal Defendants has also indicated that he is willing to  
12 consider Plaintiff’s comments and questions regarding redactions and withheld pages in the FBI’s  
13 release of records.

14 In light of these developments, the parties do not believe it would be a good use of the parties or  
15 the Court’s resources to have a Case Management Conference on May 5, 2021. Rather, the parties  
16 request that the Court continue the conference to June 3, 10 or 17 2021. The parties will continue to  
17 work to see if any aspects of this case can be resolved.

18 Respectfully submitted,

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20 Dated: April 27, 2021

STEPHANIE M. HINDS  
Acting United States Attorney

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22 Michael T. Pyle\*

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Michael Pyle  
Assistant United States Attorney  
24 Counsel for Defendants United States Department of Justice, FBI,  
25 Executive Office for United States Attorneys, and Criminal  
Division

26 \*I certify that Plaintiff’s counsel authorized me to file this stipulation.  
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1  
2 Respectfully submitted,

3 Dated: April 27, 2021

THE NORTON LAW FIRM PC

4 George C. Harris

5 \_\_\_\_\_  
George C. Harris

6 Counsel for Plaintiff Marc Cohodes

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8 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:**

9 The Case Management Conference scheduled for May 5, 2021 at 2:45 p.m. is continued to  
10 June 17, 2021 at 2:30p.m.

11 **IT IS SO ORDERED.**

12 Dated: April 27, 2021

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14 Hon. Sandra Brown Armstrong  
15 United States District Judge  
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